

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Petition for Rulemaking to Allow the)	RM-11836
MA3 All-Digital Mode of HD Radio)	
for AM Stations)	
)	MB Docket No. 13249
Revitalization of the AM Radio Service)	
)	

COMMENTS OF UNIVERSITY OF
MASSACHUSETTS

University of Massachusetts hereby submits comments in full support of the above-captioned Petition for Rulemaking (the “Petition”) filed by Bryan Broadcasting Corporation (“BBC”) urging the Commission to initiate a rulemaking proceeding to authorize the voluntary transition to the MA3 all-digital mode of HD radio for AM broadcast radio stations. University of Massachusetts is the licensee of AM station WFPB, Orleans, Massachusetts.

Experimental AM all-digital operations have resulted in the delivery of high-quality audio and a signal that is consistent, robust and duplicative of the analog signal. Allowing for the voluntary transition to AM-all digital operations would be beneficial for even those broadcasters who do not now contemplate transitioning to AM all-digital, as having the FCC allow for AM-all digital operations will offer a future option for either owned stations or potential acquisitions.

University of Massachusetts fully supports the Petition filed by BBB to allow the MA3 all-digital mode of HD radio for AM stations, so that licensees may have the ability to transition to AM-all digital operations and take advantage of the benefits thereof.

Respectfully submitted,

University of Massachusetts

A handwritten signature in black ink, appearing to read "John F. Garziglia", written over a horizontal line.

John F. Garziglia
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May 13, 2019

CERTIFICATE OF SERVICE

I, Rebecca Jacobs Goldman, hereby declare that a copy of the foregoing comments were sent via email, this day, May 13, 2019 to the following, as required by section 1.405 of the Commission's rules:

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